

UNITED STATES FEDERAL DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

United States of America)	
)	
Plaintiff)	Case No 1:15CR00175-RWS
)	
Paul Parker,)	
)	
Defendant.)	

DEFENDANT’S SENTENCING MEMORANDUM

Comes now the above named Defendant, and in support of a request for a downward departure from the current government sentencing guideline range, counsel for the Defendant argues the following factors pursuant to 18 USC 3553(a)(1) :

- 1.) The Defendant is a 56 year old male in poor physical health in large part the result of an attempted suicide attempt in January 2014. The Defendant is still recovering and being treated for the injuries resulting from that attempted suicide attempt.
- 2.) Furthermore the Defendant suffers from COPD further causing the Defendant physical discomfort.
- 3.) The Defendant also is afflicted with major depression disorder and alcohol use disorder.
- 4.) The Defendant is charged with a non-violent crimes.
- 5.) Also, the Defendant is the only and primary care giver to his long time girlfriend who is suffering from an advanced case of breast cancer.
- 6.) The Defendant is employed and has made the most of this time while out on bond regarding this case.

7.) In conclusion, the Defendant's base level offense level is 19, but because of Defendant's prior criminal history (8 points) he is given a suggested guideline sentence of no less than 46 months up to 57 months. Given, that 5 of the 8 criminal history points assessed against the Defendant relate to traffic/alcohol related incidents, counsel for the Defendant suggests that only 3 criminal history points be considered in ranking the Defendant's criminal history. Such an adjustment as described (and considering the other above noted factors) would suggest a sentencing guideline range of 33-41 months.

/s/ Attorney Steven Dyer #45397

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Certificate of service

I do hereby certify that a true and correct copy of the above and foregoing was electronically filed and served upon the Assistant US Attorney for this case 111 South 10th Street Suite 20.333 St. Louis Mo.63102 on this 9th day of July 2015.